

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Northern Division**

MANOR CARE OF AMERICA, INC.

Plaintiff,

v.

PROPERTY & CASUALTY INSURANCE
GUARANTY CORPORATION,

Defendant.

Civil Action No.
02-CV-04206 (BEL)

JOINT STATUS REPORT

Manor Care has produced voluminous records to the Defendant. The Defendant has reviewed and analyzed the records. Counsel for the parties have had extensive and frank discussions about the remaining issues in this case. The parties request the Court to set this matter for a scheduling conference. The purpose of the scheduling conference would be to set timelines for the submission of stipulations, additional discovery, summary judgment motions, and trial, if necessary. The parties respectfully request the Court to set this case for a scheduling conference within the next 30 days.

Respectfully submitted,



James H. Hulme, Bar No. 00875
Deanne M. Ottaviano, Bar No. 15659
ARENT FOX KINTNER PLOTKIN &
KAHN, PLLC
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5339
Ph: (202) 857-6000
Fax: (202) 857-6395
Attorneys for Plaintiff

/s/

Albert J. Mezzanotte, Jr., Bar No. 00197
Edward M. Buxbaum, Bar No. 05015
WHITEFORD, TAYLOR & PRESTON
L.L.P.
Seven Saint Paul Street
Baltimore, MD 21202-1626
Ph: (410) 347-8700
Fax: (410) 752-7092
Attorneys for Defendants

/s/

Gerald R. Kowalski, Pro Hac Vice
COOPER & WALINSKI, L.P.A.
900 Adams Street
Toledo, OH 43604
Ph: (419) 241-1200
Fax: (419) 242-7212
Attorney for Plaintiff

SO APPROVED:

Honorable Benson E. Legg, Judge